OBSERVATION REPORT #11 - REVISED

KPMG Consulting received unexpected "Incorrect Billing Account Number Identifier" (BAN1) errors for UNE-loop service orders.

Issue

KPMG Consulting received an unexpected "Incorrect BAN1 error" on UNE-loop service orders. KPMG Consulting submitted these orders populating the BAN1 field in accordance with a Verizon document listing necessary BAN1 inputs for various order types. This untitled document was obtained from Verizon (Jim Netska) in January 2000, prior to commencement of the submission of orders by KPMG Consulting. KPMG Consulting believes this document is available to CLECs via Verizon Account Managers.

Upon contacting the TISOC for assistance in determining a proper BAN to use, the Verizon (VZN) representative indicated that there had been a change to the BANs. KPMG Consulting was not informed of this change prior to contacting the TISOC. Furthermore, Chris Rubitz, the VZN Account Manager, reaffirmed to KPMG Consulting on September 20 that there had been a change to the BANs.

The following is a sample PON that received an unexpected "Incorrect BAN1 error":

133B041J0X000002, Ver AC, BAN1: 609Z071005, 9/7/2000 Error received: – "Incorrect BAN1, use 609Z499565"

During the 10/12/00 Observation meeting, Verizon informed KPMG Consulting that the Order Business Rules state that the BAN1 was not required on UNE-Loop Service Orders, instead "N" (New Billing Account Number Request) should be populated. KPMG Consulting agrees with Verizon, however KPMG Consulting has received Local Service Confirmations on several orders where the BAN1 was populated with a BAN instead of "N". The following is a sample:

147B021J0X000002, Ver AC, BAN1: 609Z071004, LSC received 8/31/2000. 147B031J0X000001, Ver AE, BAN1: 201Z774769, LSC received 8/31/2000.

Based on the examples KPMG Consulting has identified, Verizon is not following these Order Business Rules.

Assessment

Invalid responses to UNE-Loop orders may inhibit a CLEC's ability to serve its customers and process their orders in a timely manner.